

# Holland & Knight

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May 29, 2024

**VIA ECF**

Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010

Re: *Sound Around, Inc. v. Friedman et al.*, Case No. 1:24-cv-01986

Dear Judge Rearden,

We represent Plaintiff Sound Around, Inc. (“Plaintiff”) in the above-referenced matter. Together with counsel for Defendants, Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing, Inc., and World Group Import, LLC (“Defendants”), pursuant to Local Civil Rule 7.1 and Rule 2(E) of Your Honor’s Individual Rules and Practices, we respectfully request an extension of time for Plaintiff to respond to Defendants’ Motion to Dismiss, dated May 17, 2024 (“Motion”) and for Defendants to file their reply in support of the Motion.

Plaintiff’s opposition papers are currently due on May 31, 2024. Plaintiff requires additional time to analyze and respond to the various arguments raised in the Motion and thus seeks an extension through June 11, 2024 (the date on which Plaintiff’s reply papers in support of its Motion for Preliminary Injunction is due). Likewise, Defendants’ counsel seeks additional time thereafter within which to file their reply in support of the Motion.

Counsel for the parties conferred and have agreed to the below proposed briefing schedule:

- Plaintiff’s opposition papers to be filed June 11, 2024; and
- Defendants’ reply papers to be filed on or before June 28, 2024

There have been no prior requests for an extension of time to respond to the Motion. The extension will not affect any other deadlines.

Thank you for your consideration.

Respectfully submitted,

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